

EXHIBIT C

**UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**

AiPi, LLC

Movant,

v.

Netflix Inc.,

Respondent.

Case No. 1:24-mc-00002 (LMB/WEF)

DECLARATION OF ERIC MOREHOUSE

I, Eric Morehouse, hereby declare under penalty of perjury:

1. I am over the age of 18 years old, and I am competent in all respects to testify to the matters herein. I have personal knowledge of the facts stated herein:

2. I am a co-founder of AiPi, LLC (“AiPi”)

3. AiPi is a Delaware company with its headquarters and office located in Virginia since I founded the company in 2016.

4. Since 2016, AiPi has leased office space at 11718 Bowman Green Drive, Reston, VA 20190, but in 2024 moved its offices to 8230 Leesburg Pike, Suite 520, Vienna, VA 22182, which is where AiPi’s employees work when not working from home. AiPi does not own, lease, operate, or control any other office, distribution center, retail location, or other physical space aside from its Virginia office.

5. On September 15, 2021, Valjakka entered into a funding agreement with AiPi and signed a Litigation Plan on September 19, 2021. In the funding agreement, Valjakka and AiPi agreed that they shared a “common legal interest” in pursuing claims against potential infringers for purposes of sharing work product and privileged information.

6. Valjakka and AiPi further agreed that privileged information and work product would be disclosed to AiPi with the understanding and agreement that the privilege would not be waived, and that both parties agreed to uphold the privilege with respect to the information disclosed between them. Privileged information was only shared with AiPi because there was agreement that the information would be maintained as confidential and privileged.

7. AiPi's responsibilities under the agreement were to provide litigation support and funding. Valjakka retained all control over his claims, and the settlement of any such claims.

8. I have conducted a cursory search for documents responsive to the Netflix subpoena. The documents sought by the Netflix subpoena are protected by the common interest privilege. Further, based on my preliminary search for documents, I have determined that there are thousands of documents that would be responsive to the subpoena.

9. AiPi has not transferred any settlement proceeds to CDN. Valjakka has not settled any claims since the court in the *Netflix Litigation* issued its preliminary injunction on October 18, 2023.

I declare and affirm under penalty of perjury that the foregoing is true and correct.

Dated: July 22, 2024



Eric Morehouse